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Attorney for Alexander Roche

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 CLARK COUNTY EDUCATION
10 ASSOCIATION,

Case No.: 2:22-cv-00964-GMN-DJA

11 Plaintiff,
12 vs.

**STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME**

13 ALEXANDER ROCHE, an individual;

[FIRST REQUEST]

14 Defendant.

16 ALEXANDER ROCHE, an individual;

17 Counter Claimant,

19 vs.

20 CLARK COUNTY EDUCATION
21 ASSOCIATION, a labor union and employer;
CLARK COUNTY STAFF ORGANIZATION,
22 a labor union; DOE BUSINESS ENTITIES 1-
10; JOHN VELLARDITA, Executive Director
23 of CCEA, an individual, in his individual and
official capacities; and DOE INDIVIDUALS 1-
50.

25 Counter Defendants.

27 IT IS HEREBY STIPULATED AND AGREED by and between Defendant / Counter
28 Claimant, ALEXANDER ROCHE and Plaintiff / Counter Defendants CLARK COUNTY

1 EDUCATION ASSOCIATION, CLARK COUNTY STAFF ORGANIZATION, and JOHN
2 VELLARDITA, by and through their undersigned counsel, that Defendant / Counter Claimant
3 ALEXANDER ROCHE may have additional time within which to respond to Plaintiff /
4 Counter Defendants' *Special Motion to Dismiss* and *Motion to Dismiss* from Friday August
5, 2022 to **Friday, August 19, 2022**. This is the first request for an extension. Per
6 Judge Navarro's chambers policies, the Proposed Order is attached herewith as **Exhibit 1**.
7

8 DATED this 4th day of August, 2022

9 DATED this 4th day of August, 2022

10 By: /s/ Robert S. Melcic, Esq.
11 ROBERT S. MELCIC, ESQ.
12 Nevada State Bar No. 14923
13 3315 E. Russell Rd.
14 Ste. A4-271
15 Las Vegas, NV 89120
16 Phone: (702) 526-4235
17 Clerk: (725) 577-8013
18 Email: robertmelcic@gmail.com
19 *Attorney for Alexander Roche*

20 DATED this 4th day of August, 2022

21 By: /s/ Daniel Marks, Esq.
22 DANIEL MARKS, ESQ.
23 Nevada State Bar No. 002003
24 610 South Ninth Street
25 Las Vegas, Nevada 89101
26 Phone: (702) 386-0536
27 Fax: (702) 386-6812
28 Email: office@danielmarks.net
*Attorney for Clark County Education
Association, Clark County Staff Organization,
and John Vellardita*

29 DATED this 4th day of August, 2022

30 DATED this 4th day of August, 2022

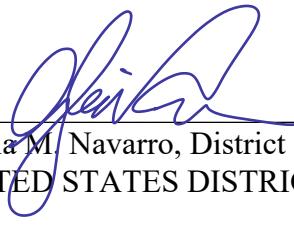
31 By: /s/ Steven Sorensen, Esq.
32 STEVEN SORENSEN, ESQ.
33 Nevada State Bar No. 15472
34 4230 McLeod Drive
35 Las Vegas, Nevada 89121
36 Phone: (702) 473-1020
37 Fax: (702) 866-6134
38 Email: ssorensen@ccea-nv.org
39 *Attorney for Clark County Education
Association*

40 DATED this 4th day of August, 2022

41 By: /s/ Adam Levine, Esq.
42 ADAM LEVINE, ESQ.
43 Nevada State Bar No. 004673
44 610 South Ninth Street
45 Las Vegas, Nevada 89101
46 Phone: (702) 386-0536
47 Fax: (702) 386-6812
48 Email: alevine@danielmarks.net
*Attorney for Clark County Education
Association, Clark County Staff Organization,
and John Vellardita*

49 **IT IS SO ORDERED.**

50 Dated this 6 day of August, 2022.

51 
52 _____
53 Gloria M. Navarro, District Judge
54 UNITED STATES DISTRICT COURT



Law Clerk <rsmlawclerk@gmail.com>

Request for extension

Law Clerk <rsmlawclerk@gmail.com>

Thu, Aug 4, 2022 at 8:00 AM

To: Adam Levine <ALevine@danielmarks.net>

Cc: Office <office@danielmarks.net>, Joi Harper <JHarper@danielmarks.net>, Steve Sorensen <ssorensen@ccea-nv.org>, Robert Melcic <robertmelcic@gmail.com>

Good morning,

I forgot that, before filing the SAO, I would need permission to affix your signature. Here is the proposed SAO as a Word Document in case you have any edits.

Please let me know if I may affix your signature to the SAO as drafted.

Thank you,
Ms. Generaux
[Quoted text hidden]

 **22.08.04 Roche.Alexander - Proposed SAO.docx**
32K



Law Clerk <rsmlawclerk@gmail.com>

Request for extension

Adam Levine <ALevine@danielmarks.net>

Thu, Aug 4, 2022 at 8:46 AM

To: Law Clerk <rsmlawclerk@gmail.com>

Cc: Office <office@danielmarks.net>, Joi Harper <JHarper@danielmarks.net>, Steve Sorensen <ssorensen@ccea-nv.org>, Robert Melcic <robertmelcic@gmail.com>

That is fine. You may affix my electronic signature.

Adam Levine, Esq.

Law Office of Daniel Marks

610 S. Ninth Street

Las Vegas, NV 89101

(702) 386-0536: Office

(702) 386-6812: Fax

alevine@danielmarks.net

From: Law Clerk <rsmlawclerk@gmail.com>

Sent: Thursday, August 4, 2022 8:00 AM

To: Adam Levine <ALevine@danielmarks.net>

Cc: Office <office@danielmarks.net>; Joi Harper <JHarper@danielmarks.net>; Steve Sorensen <ssorensen@ccea-nv.org>; Robert Melcic <robertmelcic@gmail.com>

Subject: Re: Request for extension

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